

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

United States of America,

Case No. 21-cr-108(PAM/TNL)

Plaintiff,

MOTION TO EXCLUDE

v.

Thomas Lane,

Defendant.

The Defendant Thomas Lane, through his counsel, Earl Gray, moves the Court for an order prohibiting the Government from offering the following exhibits:

6. Still images from BWC Lane
8. Still images from BWC Kueng
10. Still images from BWC Thao
13. Still images from BWC Chang
15. Still images from Milestone
21. Combined Milestone and Frazier Video/Audio
22. Still images from combined Milestone and Frazier Video
23. Combined Lane BWC and Frazier Video
24. Combined Kueng BWC and Frazier Video
25. Combined Milestone and Oyler Video/Audio
26. Still images from Combined Milestone and Oyler Video
27. Combined Milestone and Thao BWC Video
28. Combined Thao BWC and Frazier Video

29. Still images from Combined Thao BWC and Frazier Video
30. Combined Front Cup Exterior and Thao BWC
31. Combined Front Cup Exterior and Frazier Video/Audio
32. Combined Kueng BWC and Dragon Wok Video
33. Combined Thao BWC and Hanson Video
34. Combined Kueng BWC and Lane BWC with Kueng Audio
35. Combined Kueng BWC and Lane BWC with Lane Audio
36. Still images from Combined Kueng BWC and Lane BWC
37. Side by side still images (Frazier Video)
38. Side by side still images (Frazier Video)
40. Jenna Scurry Call to Sgt. David Pleoger – Audio
41. Donald Williams 911 Call Audio
42. Genevieve Hanson 911 Call Audio

This motion is pursuant to Rule 403 of the Federal Rules of Evidence. The above exhibits are cumulative, substantially prejudicial and a waste of time.

Dated this 19th day of January, 2022.

s/Earl P. Gray
Earl P. Gray #37072
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